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**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
JORGE IVAN ALVAREZ,)
)
Defendant.)
)
_____)

Case No.: 2:23-mj-0806-DJA

STIPULATION TO CLOSE CASE

IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON, United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the United States of America, and Nicholas Wooldridge, Esquire, counsel for the defendant Jorge Ivan Alvarez, that the above-captioned matter be closed.

This Stipulation is entered into based upon the following:

1. On or about March 20, 2024, defendant entered into a Petty Offense Agreement with the United States in which he agreed to plead guilty to Count One of the Complaint, Operating a Motor Vehicle while Under the Influence of Alcohol and Drugs, in violation of 36 C.F.R. § 4.23(a)(1). *See* ECF No. 9.
2. The parties agreed to recommend that defendant be sentenced to one year of unsupervised probation with the following special conditions: (i) pay a \$500.00 fine and a

1 mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1)
2 DUI course and (2) Victim Impact Panel; (iii) complete an eight (8) hour online alcohol
3 awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six
4 (6) months; and (v) not violate any local, state, or federal laws for a period of six (6) months.
5 If the defendant successfully completes his obligations within six months of unsupervised
6 probation, the court will allow the defendant to withdraw his guilty plea to count one and the
7 government will move to amend count one to reckless driving.
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9 3. On March 20, 2024, this Court sentenced defendant pursuant to the parties'
10 plea agreement. *See* ECF No. 9.

11 4. Since commencing her term of unsupervised probation, defendant has
12 successfully completed conditions (i), (ii), (iii), and (iv).

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DATED this 10th day of October, 2024.

JASON M. FRIERSON
United States Attorney

/s/ Skyler Pearson
SKYLER PEARSON
Assistant United States Attorney

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
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Plaintiff,)
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vs.)
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JORGE IVAN ALVAREZ,)
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ORDER TO CLOSE THE CASE

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defendant Jorge Ivan Alvarez has successfully completed the conditions of his sentencing.

ORDER

IT IS HEREBY ORDERED that the defendant is allowed to withdraw his guilty plea to count one and that the count one be amended to reckless driving.

IT IS HEREBY ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

DATED this 11th day of October, 2024


UNITED STATES MAGISTRATE JUDGE